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January 22, 2025

VIA ELECTRONIC MAIL

The Honorable Leo I. Brisbois  
United States District Court  
515 West 1st Street Room 412  
Duluth, Minnesota 55802-1397

**RE: KIMBALL AREA PUBLIC SCHOOLS V. I.R. M., ET AL.**  
**CIVIL FILE NO. 23-CV-02637 (NEB/LIB)**  
Motion to Extend Discovery Deadline

Dear Magistrate Judge Brisbois:

Counsel for Counter Defendants informed me that they will be bringing a motion to compel to be heard before the Court on February 11, 2025 at 10:00 a.m. The same date and time as Counter Claimants' unopposed motion to extend discovery deadlines (Dkt. 53-56).

The expert deposition is rescheduled for February 12, 2025, the day following our appearance. In this case, both parties have agreed that the Court can decide Counter Claimants' motion to extend the expert discovery deadline on the pleadings.

The purpose of this correspondence is to request that the order extending the discovery deadline be issued either before or during the appearance given the deposition was rescheduled by party agreement to February 12, 2025. Counter Defendant will not permit the expert to appear without an order.

Thank you for your time and consideration to this correspondence.

Respectfully,

Margaret O'Sullivan Kane

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